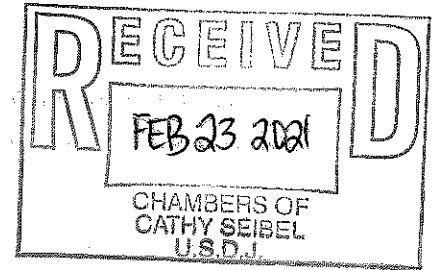


**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK  
The Honorable Judge Cathy Seibel**



**UNITED STATES OF AMERICA,  
Plaintiff,**

**V.**

**7:16-CR-00408-CS-3**

**Virginia Blanco,  
Defendant.**

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**REPLY TO GOVERNMENTS RESPONSE TO DEFENDANT'S 18 U.S.C. §  
3582(c)(1)(A)(i) MOTION FOR COMPASSIONATE RELEASE**

**TO UNITED STATES DISTRICT JUDGE: Honorable Cathy Seibel**

**Honorable Judge Seibel,**

**Defendant, Virginia Blanco filed a Motion for Compassionate Release pursuant to 18 U.S.C. 3582(c)(1)(A)(i) with this court on February 11, 2021. The Government was ordered to respond by February 18, 2021, which they've now done.**

**The government agrees that extraordinary and compelling reasons exist, insofar as Ms. Blanco's medical situation is concerned. For that reason, the government chooses not to**

further expand on the Family Hardship issues presented to the court in the Defendant's motion. Defendant would like to reiterate to the court that her family hardship is real. Ms. Blanco was the primary caregiver to her children. Currently, Defendant's mother is the sole provider for her three children. Defendant's mother is also permanently disabled. She suffers from serious medical conditions. Multiple surgeries are needed. This places the children in a situation where their sole caregiver is becoming increasingly incapacitated and no other family member is able to take on raising three children. As indicated in the initial motion, Defendant stands ready to present her mother's medical records and her mother is also willing to be heard by the court should the court desire.

Contrary to what the government has written, Section 3553(a) factors have been met here. The seriousness of the offense has not escaped Defendant and combining that with the honest way Ms. Blanco has led her life which is evident by her lack of any criminal history, supports her release under this Section. The need to promote respect for the law has been satisfied when taking the entire crime and all defendants sentences into account. The defendants history and characteristics show a person who has gone to school and worked her entire life. She is religious and someone who holds family very close to her heart.

While the Defendant realizes the very serious nature of the offenses in which she has been convicted and sentenced for, the government makes much of the fact of how violent of a robbery this was, mandating the harsh punishment she has received. The government also mentions that the Defendant was never in the bank at the time of the robbery. What the government fails to mention in their response is that prior convicted felon Giovanny Marte, the co-defendant who admitted to jumping over the teller window, pistol whipping the branch manager, holding a gun to the heads of bank employees and firing shots inside the bank was sentenced to time served. Andres Cruz, a co-defendant present at the actual robbery was sentenced to time served. Jeffrey Martinez, another co-defendant present at the actual robbery was also sentenced to time served. This disparity in sentencing cannot be overlooked. While it's true that the above named defendants were rewarded with such favorable sentences due to their cooperation, it boggles the mind to think that all a violent offender in the SDNY needs to do is cooperate on criminal activity to earn a 'get out of jail free card' after committing a violent attack. Ms. Blanco, unable to cooperate with the government on any criminal activity (as defendant was unaware of any such activity), seems to be penalized for that fact. It is also worth mentioning that the governments adamance on such a tough sentence needing to be served falls on the backdrop of a much lesser sentence that was offered by the same government prior to trial commencing. The government seems to be saying that since the defendant went to trial, the charges of which she was convicted of suddenly become much more serious warranting years more in prison.

Your Honor, it is true that Ms. Blanco has only served slightly over 31 months as the

government has highlighted multiple times. Defendant has never been to prison before. In fact, prior to these charges being filed, Ms. Blanco had no criminal history. There is zero chance that Defendant will ever find herself in a situation like this again. Defendant has already fallen seriously ill once to COVID-19 and measures to prevent reinfection at FCI Danbury fall far short of any CDC Guidelines. Ms. Blanco has a strong will and desire to take care of her children. She loves them all so very much. With her mother's medical condition impeding the care of her children and with no other family member able to care for the children, Ms. Blanco respectfully asks this court to grant her motion for compassionate release and place her on Home Confinement with stringent conditions for the remainder of her sentence.

Respectfully Submitted,

VB

Virginia Blanco #79564-054

FCI Danbury

Federal Correctional Institution

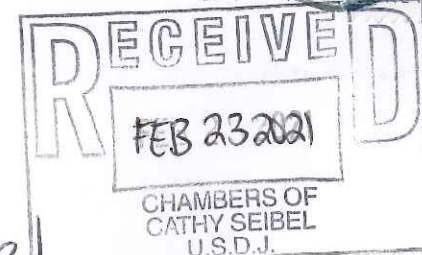
Route 37

Danbury, CT 06811

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WESTCHESTER NY 105

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HON. Cathy Seibel  
United States District Court Judge  
United States Courthouse  
300 Quarropas Street  
White Plains, NY 10601

10601